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COUNSEL FOR TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE:	§	
MICHAEL STEPHEN GALMOR,	§	CASE NO. 18-20209-RLJ-7
Debtor.	§	
And	§	
GALMOR'S/G&G STEAM SERVICE, INC.,	§	CASE NO. 18-20210-RLJ-7
Debtor.	§	
<hr/>		
KENT RIES, TRUSTEE,	§	
Plaintiff,	§	
v.	§	ADVERSARY NO. 20-2003
GALMOR FAMILY LIMITED PARTNERSHIP and GALMOR MANAGEMENT, L.L.C.,	§	
Defendants.	§	

**APPLICATION FOR APPROVAL OF EMPLOYMENT OF
KELLYE FUCHS AS A LITIGATION CONSULTANT**

TO THE HONORABLE ROBERT L. JONES, BANKRUPTCY JUDGE:

COMES NOW, Kent Ries, Trustee (“Trustee”) of the referenced Chapter 7 bankruptcy estates and Plaintiff herein, and hereby files his Application for Approval of Employment of

Kellye Fuchs as a Litigation Consultant (the “Application”), and would show the Court the following:

1. Adversary Proceeding 20-2003 (the “Adversary”) was initiated on April 24, 2020 as a severed claim from Adversary Proceeding No. 19-2006.
2. The Trustee asserts it is necessary to employ Kellye Fuchs of PK & Company, PLLC, pursuant to 11 U.S.C. § 327(e), to review and potentially testify about historical accounting and related information regarding the bankruptcy Estates’ claims in the Adversary.
3. The Adversary involves claims against the Defendant entities for reimbursement of advances and expenses incurred by the two referenced bankruptcy Estates. The claims were scheduled by the Debtors in both cases and are being disputed by the Defendants in the Adversary.
4. The Trustee desires to hire Kellye Fuchs in the Adversary primarily to obtain her factual knowledge and accounting expertise regarding the issues that are the core issues in the Adversary. Kellye Fuchs is a Certified Public Accountant who previously performed services for both Debtors, and their related entities, including the adverse parties. Kellye Fuchs and her firm also have documents and knowledge of the relationship of the parties and their historical financial transactions that form the basis of the Adversary. Kellye Fuchs expertise as a Certified Public Accountant will assist the Trustee in the prosecution of the claims in the Adversary, including responding to the defenses raised by the Defendants.
5. The Trustee desires that he be authorized to employ Kellye Fuchs and to pay her such compensation and reimbursement of expenses as is just pursuant to 11 U.S.C. § 330 and Rule 2016 of the Federal Rules of Bankruptcy Procedure. Kellye Fuchs has substantial experience in the preparation of accounting records, financial statements and tax returns. Kellye

Fuchs' affidavit as required by 11 U.S.C. § 327 is attached hereto as Exhibit A and incorporated herein by reference for all purposes.

6. The hourly rate for legal services provided by Kellye Fuchs to the bankruptcy Estates will be \$275.00 per hour.

WHEREFORE, PREMISES CONSIDERED, Kent Ries, Trustee herein, respectfully prays for an Order of this Court approving the employment of Kellye Fuchs as a litigation consultant to perform professional services for the Trustee in the Adversary Proceeding, and for such other relief, at law or in equity, to which the Trustee may show himself justly entitled.

Respectfully submitted,

Kent Ries, Attorney at Law
2700 S. Western St., Suite 300
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By: /s/ Kent Ries 
Kent Ries
State Bar No. 1691450

COUNSEL FOR TRUSTEE

CERTIFICATE OF SERVICE

I certify that on the 6th day of August, 2021, a true and correct copy of the foregoing Application was sent either electronically via ECF or mailed in the United States mail, postage prepaid, to the parties listed below and on the attached mailing matrix.

Kellye Fuchs
P K & Company, PLLC
1000 N Main St
Elk City, Oklahoma, 73644
pkcompany@pk-cpa.com
Phone: (580) 225-8877

/s/ Kent Ries

Kent Ries

STATE OF TEXAS
§
COUNTY OF POTTER
§

KNOW ALL MEN BY THESE PRESENTS:

AFFIDAVIT OF KELLYE FUCHS

BEFORE ME, the undersigned authority, on this day personally appeared Kellye Fuchs, Elk City, Oklahoma, being by me duly sworn, upon oath deposed and said:

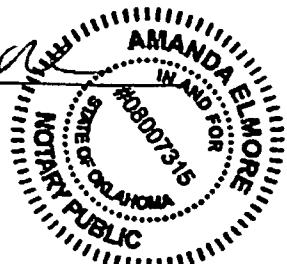
- Deekay*
1. I am a resident of Elk City, ___ County, Oklahoma; am over the age of 21 years and am of sound mind and have never been convicted of an offense.
 2. I am Certified Public Accountant licensed to practice in the State of Oklahoma, and possess all of the qualifications of a Certified Public Accountant in the State of Oklahoma.
 3. I have reviewed the *Application* by the Trustee for approval to retain Kellye Fuchs as litigation consultant. I have extensive knowledge and experience in accounting practices and procedures and am in all respects qualified to render the necessary consulting services requested by the Trustee.
 4. Kellye Fuchs and her accounting firm, P K & Company, PLLC, have previously represented Michael Stephen Galmor, Galmor's/G&G Steam Service, Inc, and Galmor Family Limited Partnership and Galmor Management, L.L.C. in preparing tax returns and financial statements. Other than this representation, I have no connection with any creditors of the estates, any party in the United States Trustee's office or any other parties which have interests adverse to the Bankruptcy Estates.

FURTHER AFFIANT SAITH NOT.

Kellye Fuchs
Kellye Fuchs

SWORN TO AND SUBSCRIBED BEFORE ME this 30th day of July, 2021.

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Notary Public, State of Oklahoma



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